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November 19, 1999

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IN THE CHAMBERS OF
MARVIN J. GARBIS

NOV 1 1999

VIA HAND-DELIVERY

UNITED STATES DISTRICT COURT

The Honorable Marvin J. Garbis
 United States District Court for
 the District of Maryland
 530 U.S. Court House
 101 West Lombard Street
 Baltimore, Maryland 21201

RE: *Reliance Insurance Company v. J.L. Hickman & Company, Inc., et al.*
 In the United States District Court for the District of Maryland
 Civil Action No. MJG-97-3194

Dear Judge Garbis:

I write on behalf of counsel for all parties in the above-mentioned matter to request that the current deadline of November 19, 1999 for filing motions for summary judgment be extended to and including Friday, December 17, 1999. In addition, with consent of all parties, Reliance requests permission to extend the discovery deadline for the sole purpose of issuing a subpoena to Bank of America to compel compliance with Mr. Miller's outstanding request for the production of certain checks.

Bank of America (formerly NationsBank) has not yet produced the checks that were requested by the parties in late September and has only this week produced additional account records. I have enclosed with this letter Mr. Conte's correspondence of November 16 which outlines the status of his efforts to secure these records from Bank of America. Until those last documents are received, Reliance cannot complete Mr. Miller's deposition, a necessary prerequisite to Reliance's completion and filing of dispositive motions.

The scheduling order did not set a trial date, so the requested adjustment of the summary judgment deadline will not affect any other scheduling in this case.



The Honorable Marvin J. Garbis
November 19, 1999
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I trust the Court will let counsel know if this request is approved, or if any further information is desired. Thank you for your attention to this matter.

Respectfully,

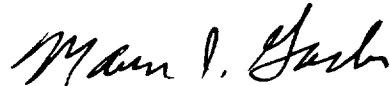


Philip M. Andrews

PMA/rrc

cc: Christopher A. Conte, Esquire - By Facsimile (301) 495-9759 and First-Class Mail
Gerard P. Martin, Esquire - By Facsimile (410) 547-1605 and First-Class Mail
Michael Horn, Esquire - By Facsimile (972) 248-8085 and First-Class Mail
Ms. Felicia Cannon, Clerk - By Hand Delivery

Approved this 2nd day of November 1999



Marvin J. Garbis
United States District Judge